

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

<p>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</p>	<p>MDL No. 2875</p>
<p>THIS DOCUMENT RELATES TO ALL CASES</p>	<p>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</p>

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE OPINIONS OF JOHN FLACK, M.D., M.P.H.**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida with Nigh Goldenberg Raso & Vaughn and serve as Court-appointed Plaintiffs' co-lead counsel to the Plaintiff's side. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' Reply in Support of Plaintiffs' Motion to Exclude opinions of defense expert John Flack, M.D., M.P.H.
2. Attached hereto as **Exhibit 1** to the Motion is a true and accurate copy of the February 1, 2023 Transcript of the videotaped deposition of John Flack, M.D., M.P.H.
3. Attached hereto as **Exhibit 2** to the Motion is a true and accurate copy of the Expert Report of John Flack, M.D., M.P.H.

**NIGH GOLDENBERG RASO
& VAUGHN, PLLC**
Attorneys for Plaintiffs

Dated: April 25, 2023

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